

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x  
LEARNING ANNEX HOLDINGS, LLC,  
LEARNING ANNEX, LLC, and  
LEARNING ANNEX, L.P.,

Plaintiffs,

09-CV-4432 (SAS/GWG)

- against -

RICH GLOBAL, LLC and  
CASHFLOW TECHNOLOGIES, INC.,

Defendants.

-----x

**PLAINTIFFS' OBJECTIONS TO DEFENDANTS' DEPOSITION DESIGNATIONS  
AND COUNTER-DESIGNATION**

Learning Annex v. Rich Dad, 09-cv-4432Plaintiffs' Objections to Rich Dad Deposition Designations<sup>1</sup> and Counter-Designation

Defendant's Designation	Plaintiffs' Objection	Plaintiffs' Counter-Designation <sup>2</sup>
Sharon Lechter (11/19/09)		
103:13-106:5	Relevance; form; hearsay	
121:13-25	Not admitted at first trial; misleading; confusing; prejudicial	121:5-121:12

<sup>1</sup> Defendant reserves the right to supplement its designations in the event that the Court allows into evidence facts that Defendant apparently intends to exclude in its future motion *in limine*.

<sup>2</sup> Plaintiffs reassert their objection to any designation that was not admitted at the first trial. This counter-designation is listed only in the event that the Court allows Defendants' designation.